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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
A RESPONSE TO DEFENDANTS'
MOTION TO STAY DISCOVERY**

**(FIRST REQUEST – to Extend time to
file a Response to Motions to Stay
Discovery)**

IT IS HEREBY STIPULATED by and between Plaintiff, Brenna Schrader, (“Plaintiff”),
through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendants, Wynn Las
Vegas, LLC (“Defendant WLV”) and Wynn Resorts, Ltd. (“Defendant WRL”), through their
counsel Jackson Lewis P.C., Defendant, Stephen Alan Wynn (“Mr. Wynn”), through his counsel
Peterson Baker, PLLC, and Defendant, Maurice Wooden (“Mr. Wooden”), by and through his
counsel Kennedy & Couvillier, (collectively “Defendants”), that Plaintiff shall have an extension
up to and including May 24, 2020 to file a response to motions seeking to stay discovery.

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1 This Stipulation is submitted and based upon the following:

2 1. On April 7, 2021, Mr. Wynn and Defendants WLW and WRL filed Motions to
3 Stay Discovery [ECF Nos. 101, 106]. Mr. Wooden filed a Joinder [ECF No. 102].

4 2. Defendants collectively filed five motions starting on March 31, 2021 and ending
5 on April 7, 2021. [ECF Nos. 98, 99, 101, 103, and 106].

6 3. Due to the complexity of the motions filed and Mr. Huber's need to continue home
7 schooling for the time being, Plaintiff respectfully seeks an extension up to and including May 24,
8 2021 to file responses.

9 4. In anticipation of potential Coronavirus obstacles and to avoid the need of filing an
10 additional stipulation, the parties also stipulate the Defendants' Replies to Plaintiff's responses to
11 the pending motions will be due three weeks later, on June 14, 2021.

12 5. This is the first request for an extension of time for Plaintiff to file a response to
13 Defendants' motions, and for an extended period for Defendants' reply briefs.

14 6. This is the first stipulation related to Defendants' replies.

15 7. This request is made in good faith and not for the purpose of delay.

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8. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 21st day of April, 2021.

RICHARD HARRIS LAW FIRM

/s/ Burke Huber

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Maurice Wooden

/s/ Tamara Beatty Peterson

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Stephen Alan Wynn

ORDER

IT IS SO ORDERED:



United Magistrate Judge

Dated: April 23, 2021